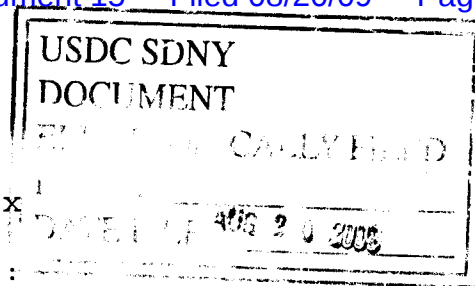


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

PAUL KURUZOVICH,

Defendant.

INFORMATION

09 CRIM - 824

JUDGE CHIN

COUNT ONE

The United States Attorney charges:

1. From at least in or about March 2007, up to and including May 2009, in the Southern District of New York and elsewhere, PAUL KURUZOVICH, the defendant, unlawfully, willfully, and knowingly, with intent to convert a trade secret, that is related to and included in a product that is produced for and placed in interstate and foreign commerce, to the economic benefit of one other than the owner thereof, and intending and knowing that the offense would injure an owner of that trade secret, knowingly did and attempted to (a) steal and without authorization appropriate, take, carry away, and conceal, and by fraud, artifice, and deception obtain such information; (b) without authorization copy, duplicate, download, upload, alter, replicate, transmit, deliver, send, mail, communicate, and convey such information; and (c) receive and possess such information knowing the same to have been stolen and appropriated, obtained and converted without authorization, to wit, KURUZOVICH, without authorization, attempted to and did access password-protected

areas of Company-1's Internet website and attempted to and did steal information relating to its proprietary database of experts and advisors.

(Title 18, United States Code, Sections 1832(a)(1)-(4) and 2.)

COUNT TWO

The United States Attorney charges:

2. From at least on or about in or about March 2007, up to and including May 2009, in the Southern District of New York and elsewhere, PAUL KURUZOVICH, the defendant, unlawfully, knowingly, and willfully, under a threat of informing, and as a consideration for not informing, against a violation of a law of the United States, demanded money and other valuable things, to wit, KURUZOVICH, on multiple occasions, sent communications, including emails, to Company-1 in which he threatened to disclose to law enforcement authorities alleged illegal conduct occurring at Company-1 if Company-1 did not pay him certain sums of money.

(Title 18, United States Code, Sections 873 and 2.)



PREET BHARARA *SSR*
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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PAUL KURUZOVICH,

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INFORMATION

09 Cr. ____ (____)

(18 U.S.C. §§ 1832(a)(1)-(4),
873, and 2)

PREET BHARARA
United States Attorney.
